

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DREW DIXON,

Plaintiff,

23-cv-9878 (VEC)

-against-

NOTICE OF MOTION

ANTONIO MARQUIS “L.A.” REID,

Defendant,
-----X

PLEASE TAKE NOTICE that based upon the annexed declaration of Bobbi C. Sternheim and the accompanying memorandum of law, counsel for Defendant Antonio Marquis “L.A.” Reid will move this Court, before the Honorable Valerie E. Caproni, at the United States District Court, located at 40 Foley Square, New York, NY 10007, at a time to be determined by the Court, seeking orders:

- Dismissing Counts II and III of Plaintiff’s Complaint;
- Striking certain statutory references in Count I; and
- Granting such other and further relief this Court deems just and proper.

By filing these motions, Defendant does not waive or intend to waive his right to demur or otherwise object to the Complaint filed by Plaintiff.

Dated: New York, NY
January 8, 2024

Bobbi C. Sternheim
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/s/ Shawn Holley

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Attorneys for Defendant

To: Court and counsel via ECF

UNITED STATES DISTRICT COURT
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DREW DIXON,

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DECLARATION

ANTONIO MARQUIS "L.A." REID,

Defendant,
-----X

BOBBI C. STERNHEIM, ESQ., pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury:

1. I am an attorney admitted to practice before this Court.
2. This declaration is submitted in support of Defendant's motions to dismiss counts and strike certain statute references in the Complaint.
3. The facts and law in support of these motions are contained in the accompanying memorandum of law.
4. Plaintiff's counsel is aware of the motions, the contemplation of which is stated in the joint letter submitted to the Court. *See* ECF Doc. 16.
5. In compliance with the Court's Individual Rule 4B, the parties had a teleconference with the Court to discuss the motion to strike.
6. For the reasons stated in the Defendant's memorandum of law, it respectfully requested that the Court grant the motions.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
January 8, 2024

Bobbi C. Sternheim
BOBBI C. STERNHEIM, ESQ.